



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

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Ref: EPR-N

AUG 06 2009

Rhonda O'Byrne, District Ranger
Northern Hills Ranger District
Black Hills National Forest
2014 North Main Street
Spearfish, SD 57783

Re: Telegraph Project Area Final EIS
CEQ # 20090224

Dear Ms. O'Byrne:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Telegraph Project Area, in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4231 and Section 309 of the Clean Air Act.

The EPA appreciates the level of consideration given in responding to agency and public comments that were provided during the review of the Draft EIS. Particular attention was given to concerns surrounding the proposed new road construction and the subsequent environmental impacts. As a result, Alternative E was developed and analyzed in the FEIS, which eliminated all new road construction as well as conversion of existing unclassified roads to National Forest System road. Although this alternative was not selected, EPA appreciates that an alternative was included and evaluated in the FEIS to address this specific concern. While Alternative E has the least environmental impacts associated with new road construction, Alternative C with modifications will be implemented, which has less road development than the original proposed action of Alternative B.

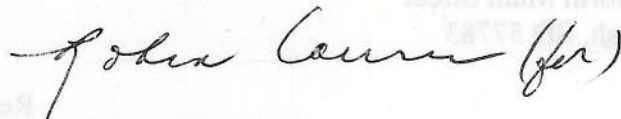
EPA also acknowledges that supplementary information was included in the Hydrology/Soils section to more clearly document, among other things, the relationship between the alternatives and the Connected Disturbed Areas in each watershed. Additional tables were also included in the FEIS that disclose to reviewers soil health of the project area as well as commercial treatments that were proposed on steep slopes for each alternative.

EPA continues to have some remaining concerns regarding adaptive management planning. EPA acknowledges that future conditions are not always predictable and that the Forest Service has implemented planned monitoring activities. However, although the Forest Plan may include standards and guidelines for future management practices, EPA suggests that

specifics on thresholds and decision trees for management alternatives and mitigation be outlined at the project level. The absence of adaptive management strategies to specific project areas could inhibit a timely response to unforeseen circumstances, such as drought or wildfires, which tend to cause dramatic environmental changes in a relatively short amount of time.

We appreciate the opportunity to participate in the review of this project during the NEPA process. If you have any questions regarding EPA's input, please contact me at 303-312-6004, or Melanie Wasco of my staff at 303-312-6540. Thank you for your consideration.

Sincerely,



Larry Svoboda
Director, NEPA Program
Ecosystems Protection and Remediation